

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ATM SHAFIQUK KHALID,

Plaintiff,

v.

CITRIX SYSTEMS, INC.,

Defendant.

Civil Action No. 2:16-cv-00650-JCC

NOTICE RE: DKT. NO. 25 (PLAINTIFF'S
ACCOUNTING OF ATTORNEY'S FEES
AND ANY COSTS)

Pursuant to Docket No. 25, Order Remanding Case, the Plaintiff ATM Shafiquk Khalid hereby submits the following accounting of the "just costs and any actual expenses, including attorney's fees, incurred as a result of the removal." Exhibit A to this notice includes an invoice identifying all attorney and paralegal fees expended as a result of removal. The attorney identified on the invoice as "M.Walters" is the undersign attorney, whose billing rate is \$495/hour. The paralegal identified on the invoice as L. Gero is Laurie Gero. Mrs. Gero's billing rate is \$145/hour. Undersigned counsel believes his hourly rate to be reasonable for intellectual property litigation by an attorney in private practice having 16 years of experience (undersigned counsel has been practicing intellectual property litigation since 2000).

Exhibit B to this notice are published rates for intellectual property litigators based on a national survey of practitioners conducted by the American Intellectual Property Law

NOTICE RE: DKT. NO. 25 - 1
Civil Action No. 2:16-cv-00650-JCC
XENN-6-1001P06

LOWE GRAHAM JONES PLLC


701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

1 Association (AIPLA) in 2012 (results published in 2013). According to these results, the mean
2 billing rate for a private law-firm partner of 15 to 24 years of experience was \$481 per hour.

3 Accordingly, Plaintiff requests \$18,460 in fees and \$0 in expenses as a result of
4 Defendant's wrongful removal.

5
6 DATED this 29th day of July, 2016.

7
8 LOWE GRAHAM JONES^{PLLC}

9 s/Mark P. Walters

10 Attorney, WSBA No. 30,819

11 Walters@LoweGrahamJones.com

12 701 Fifth Avenue, Suite 4800

13 Seattle, Washington 98104

14 T: 206.381.3300

15 F: 206.381.3301

16
17 *Attorneys for ATM Shafiqul Khalid*

CERTIFICATE OF SERVICE

I certify that on July 29, 2016 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and served the following attorney of record:

Anthony S. Wisen
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
tonywisen@dwt.com

Attorneys for Citrix Systems, Inc.

LOWE GRAHAM JONES^{PLLC}

s/Laurie Gero
Laurie Gero, Paralegal